

### **REMARKS/ARGUMENTS**

In the Office Action, the Examiner has rejected the independent claims of the application, i.e., claims 1, 3, 4, 6, 7, and 8, based on Leung. Applicants respectfully submit that Leung does not disclose the features of the amended claims.

In Applicants' invention, as particularly claimed in independent claims 1, 3, 4, and 6, a unit is claimed that performs paging to the mobile node. Thus, in Applicants' invention, the mobile node is paged. In the present invention, there is disclosed a mobile node that can be in a dormant state. The paging "wakes up" the mobile node. Applicants' specification at page 15, lines 3-11. Applicants respectfully submit that Leung provides no disclosure for paging a mobile node. First, in Leung, a disclosed mobile node is a laptop computer and there is no distinguishing between a dormant state and an in-communication state for a node or a mobile router. The laptop has to transmit a registration request whenever it moves. Thus, since there is no disclosure in Leung for a dormant state for a mobile node, there is no need in Leung for a unit to page the mobile node, as claimed by Applicants.

In the Office Action, the Examiner appears to argue that the registration request packet 502 discloses a "page" if the type field 542 is set as a "Registration Reply". However, Applicants respectfully note that even if this Registration Reply can in any way be interpreted as "paging", this Registration Reply is still sent by a Mobile IP mobile router, (Col. 11, lines 31-34) and thus cannot disclose a unit that performs a paging to a mobile node, as claimed by Applicants. Rather, the Registration Reply in Leung is a message that is sent from a mobile router, and not, to a mobile node. Thus, Applicants respectfully submit that the Registration Reply, nor any part of the registration request packet 502 in Leung, cannot disclose Applicants' claimed feature where a unit performs paging to the mobile node. Applicants respectfully submit that Leung cannot disclose this feature of Applicants' invention because Applicants' invention and Leung operate

in totally different manners. In Leung, the mobile router must register. In Applicants' invention, a dormant mobile node is not required to register. Rather, it can become active in response to a paging signal sent to it by a location manager and a mobile router with which it is associated, which then allows the mobile node to become in-communication with a communication source that is trying to communicate with the now-active mobile node. See Applicants' specification at least at page 14, line 20 to page 15, line 11, and Figure 2.

Further, Applicants respectfully submit that any packets transmitted to a mobile router by a Foreign Agent cannot be considered to be any "paging" of a mobile node, as also apparently argued by the Examiner in the Office Action in connection with claim 6. Applicants respectfully submit that the packets are transmitted to a mobile router by the Foreign Agent, and not to a mobile node, as claimed by Applicants (Applicants respectfully submit that they distinctly claim both a mobile router and a mobile node in the claims and that transmission to the mobile router in the reference cannot disclose transmission to the separately claimed mobile node). Additionally, Applicants respectfully submit that any packets forwarded by a Foreign Agent to a mobile router cannot be considered to be "paging" a mobile node. All that this forwarding of packets is by the Foreign Agent is forwarding of packets to networks associated with the mobile router via the mobile router. Col. 14, lines 27-41.

Therefore, Applicants respectfully submit that independent claims 1, 3, 4, and 6 are allowable for at least the above reasons.

Further with respect to independent claims 7 and 8, Applicants have more-particularly claimed the feature of Applicants' invention of a location manager. Thus, in claim 7, the claimed routing manager includes a unit that replies the routing address information to an inquiry from a location manager, and in claim 8, the claimed routing manager includes a unit that notifies the updated routing address information to a location manager. Applicants respectfully submit that these features of Applicants' invention are clearly

disclosed in Applicants' specification at least at page 42, line 5 to page 43, line 2. In Applicants' invention, a mobile node or a mobile router is managed in a location area by a location manager. Applicants respectfully submit that, even if the creating/deleting of bindings can be interpreted as a "response to an inquiry" and the "notifying" of updated information, as previously claimed in claims 7 and 8 and as argued by the Examiner in the Office Action, that this argued "response" is not a response to an inquiry from a location manager about the routing address information for the mobile router and that this argued "notifying" is not notifying the updated routing address information to a location manager, as now more-particularly claimed. Further, Applicants respectfully submit that the Foreign Agent in Leung cannot be interpreted to be Applicants' claimed "location manager". If Applicants' claimed "routing manager" is interpreted to be disclosed in Leung by the Home Agent, the Home Agent does not respond to an inquiry from the Foreign Agent about the routing address information for the mobile router nor does the Home Agent notify the updated routing address information to the Foreign Agent. This information is provided directly to the Foreign Agent by a mobile node when the mobile node is roaming in a remote network. Col. 2, lines 12-17. Therefore, Applicants respectfully submit that amended independent claims 7 and 8 are allowable over Leung. Applicants also respectfully submit that claim 3 also claims the location manager.

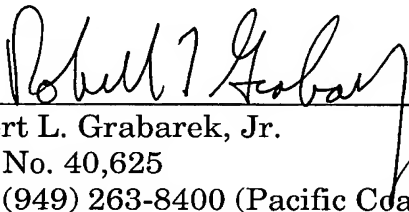
Further in this Amendment, Applicants have provided a new Abstract of the Disclosure. Regarding the Examiner's other objections to the specification, Applicants respectfully submit that the spacing issues are a result of the proportional spacing used in the document. Applicants are submitting in conjunction with this Amendment a Substitute Specification that corrects this issue and other minor typographical issues in the specification. Applicants respectfully submit that the Examiner's objections to the Abstract and specification have now been overcome.

Applicants respectfully submit that the application is now in condition for allowance. If there are any questions regarding this Amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

As provided for above, this paper should be considered as a Petition for an Extension of Time sufficient to effect a timely response. Please charge any deficiency in fees, or credit any overpayment of fees, to Deposit Account No. 05-1323 (Docket No. 010755.53179US).

Respectfully submitted,  
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